



Contents

- 3. A Note From Andrew Osborne

Decision Framework

- 5. Decision-Making Wheel
- 6. Questions to Ask Ourselves when Decision-Making

Introduction

- 8. Introduction
- 9. Our Values
- 10. Speaking Up
- 10. No Retaliation

Quality

- 12. Maintaining Accurate Business Records
- 12. Commitment to Quality

Integrity

- 14. Conflicts of Interest
- 15. Fraud
- 15. Relationships with External Providers
- 16. Gifts and Entertainment
- 17. Anti-Corruption and Anti-Bribery
- 18. Money Laundering
- 19. Sponsorship and Charitable Donations
- 20. Political Activities
- 20. Fair Competition

Openness

- 22. Inclusion
- 23. Friends and Relatives; Co-Worker Relationships

Caring

- 25. Safety Health and Environment (SHE)
- 26. Wellbeing
- 28. Our Commitment to Fair Working Conditions
- 29. Data Protection (Protection of Personal Data) and GDPR
- 30. Confidentiality
- 31. External Communications (including social media activity)

Progressive

- 33. Sustainability
- 35. Learning, Developing and Thriving



Code of Ethics

"Our Code of Ethics (Code) is becoming ever more important as our business collaborations grow and we attract new talent. It is here to answer questions from both our people and wider stakeholders regarding how we do business, within the framework of professional standards, laws and regulations. Consistent and common adherence ensures we all have clarity in what is expected of us and empowers each of us to hold ourselves and our colleagues to account for our behaviours. If you are ever in any doubt on what to do, remember to consult our Decision-Making Wheel on page 5 of this document. Osborne's success is dependent on individual commitment, and what we each put in. So, let's continue to work and innovate together."

A handwritten signature in black ink, appearing to read 'A Osborne', with a stylized, flowing end stroke.

Andrew Osborne, Chairman

Decision Framework

Decision-Making Wheel

We work in a high pressure industry and decisions often have to be made in challenging circumstances. This Code and Our Values will guide you to ensure you never take shortcuts or opt for an expedient or risky course of action.

Our reputation is very important to us. Whilst we must address Code of Ethics issues promptly it is vital that we also take a long term view. Sometimes we may observe things that might not damage our reputation right now but could affect us in the future, it is vital that action is taken on these potential problems as well as the more obvious, immediate challenges.

If you have any doubts you should seek guidance. You will always be supported when you act in accordance with our collective values.



Questions to Ask Ourselves when Decision-Making



Recognise Event

- Does it align with Osborne's purpose and values?
- Is it legal?
- Are you aware of others' unethical or illegal behaviour (e.g., colleagues, clients, suppliers and other parties)?
- Are you trying to make a decision but are unsure of the ethical implications?
- Does it feel like the 'right' thing to do and could I explain my actions to colleagues or family without feeling uncomfortable?
- Could I justify my actions if they were on the front page of the newspapers?



Assess Situation

- Who is affected?
 - You?
 - A colleague/your team?
 - Osborne – the company?
 - A client?
 - A supplier?
 - Other third parties?
- What are the guiding parameters?
 - Osborne's policies.
 - Client reactions.
 - Wider third party reactions.
 - Osborne's Purpose.
 - Osborne's values



Decide what to do

- What are your options?
- What are the likely results of each option?
- Is there an alternative solution that does not pose an ethical conflict?
- Consult as appropriate.
- Use resources available to you.
- Make a decision on what to do.



Agree way forward

- Test your decision—does it feel right? Can you sleep at night?
- Would you be embarrassed if others knew what you did, or did not do?
- Reflect on what a reasonable person would think.
- Consult again, if necessary.
- Act when you are confident with your decision, and always in good faith.



Reporting and Communicating

- Report your concerns to appropriate resources (e.g., People Team, your line manager, the Ethics Committee) as necessary.
- Communicate your concerns and rationale to the relevant stakeholders, as appropriate.
- Reflect on what you have learned and whether anything needs to change.

Introduction

Introduction

What is a Code of Ethics?

Our business is complex. Every day there are thousands of interactions between colleagues, with customers, suppliers and with the public.

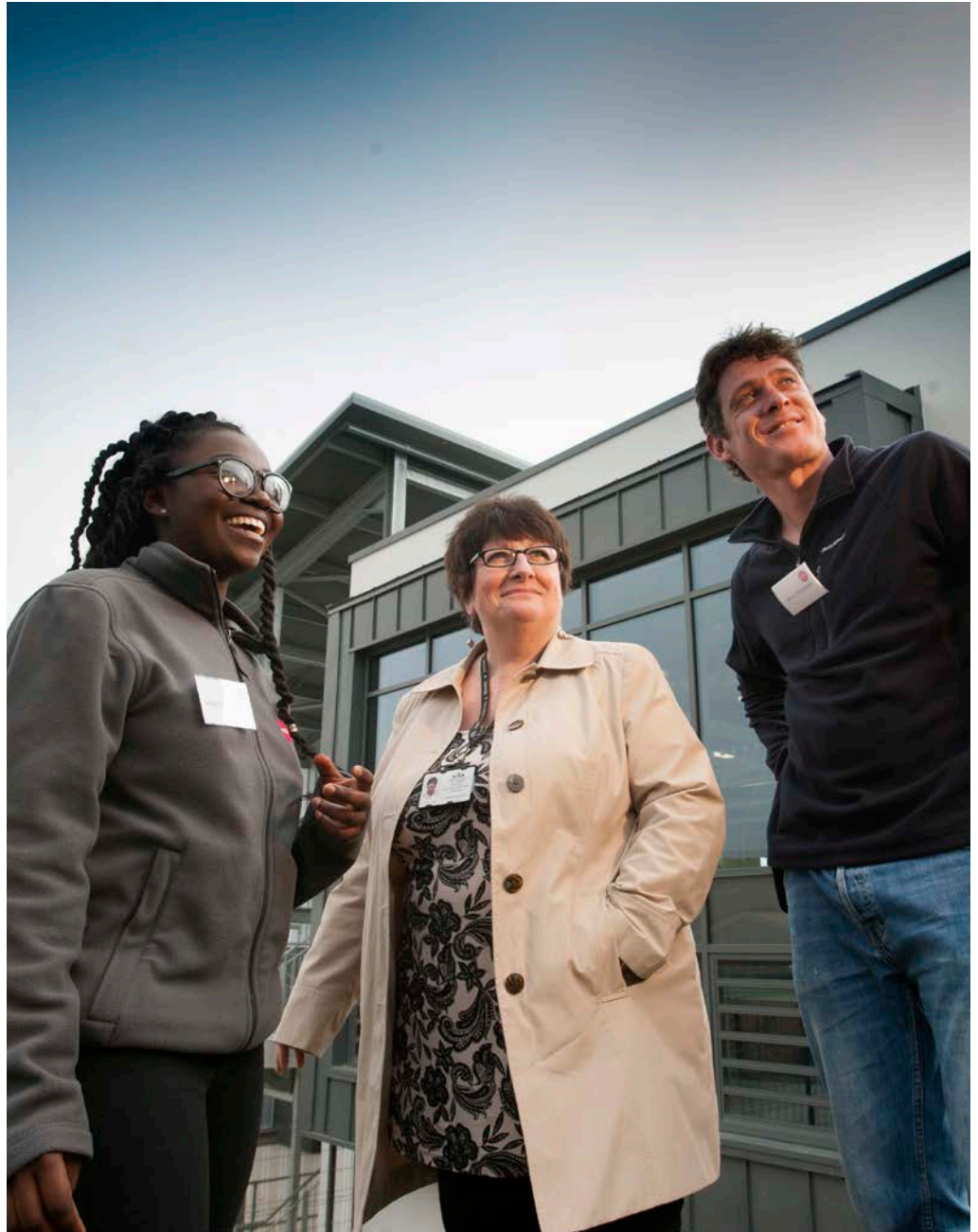
Our Code of Ethics is here to remind you of our values and provide guidance for your everyday actions when needed. The Code helps us to hold ourselves and our colleagues to account for our behaviour. It explains what you should do if you experience any behaviour that you believe is unethical, illegal or which falls short of the expected standards.

More detailed guidance on many of the issues covered in the Code of Ethics can be found by clicking on the hyperlinks in this document or in the specific policy documents available in Policy Hub.

Who does the Code Apply to?

The Code of Ethics applies to everyone representing the business, whether full or part time, permanent or contract. Managers and supervisors have particular responsibility to ensure that the letter and the spirit of the Code are observed at all times.

Specific sections of the Code also apply to subcontractors, suppliers, consultants and agents. Where we work in partnership with other organisations - whether as a joint venture or part of consortium or delivery team - this Code or comparable guidance must be jointly applied.





Our Values

We are extremely proud of the fact that we are an ethical company, and of the way that our people conduct themselves day-in, day-out.

Respect, honesty, integrity and fairness guide everything we do: the way we treat our people, how we deal with customers, suppliers and partners, and how we interact with the communities and environments in which we work.

As an ethical company our beliefs and actions are shaped by core values:

- **Quality.** Be professional and do a job of which everyone is proud
- **Integrity.** Being honest, straightforward and treat others as you would expect to be treated
- **Openness.** Be prepared to listen and give constructive feedback and be open to new ideas and different points of view
- **Caring.** Encourage support, understand and respect each other
- **Progressive.** Continually adapt and improve to be the best

We will never knowingly do anything that risks causing harm to people or the environment.

Read more about Osborne Values [here](#).

We actively seek opportunities to do 'positive good' and leave a beneficial legacy from our activities.

No company can train or prepare people on how to react to every situation. That's why our values matter in shaping behaviours and attitudes based on doing the right thing. We all know the principles by which we operate. The Code of Ethics is here to provide specific guidance when needed.

Our values are the bedrock of our success and we expect every one of us to live by them and have the confidence to challenge any behaviour that falls short.

Through our values we will continue to build a company that is a great business to work for, and a great business to work with.

Doing the right thing is important - doing the right thing is good for business.



QUALITY



INTEGRITY



OPENNESS



CARING



PROGRESSIVE

Speaking Up

Facing a dilemma? Something doesn't feel right? Need advice?

Consult. Pick up the phone. Send an email. Set a meeting. Speak up.

Speaking up is an example of us living our values, and is crucial to our long term success. The freedom to raise concerns is also a core component of an ethical business culture. Each of us, no matter our role or level, are empowered to raise concerns and express ourselves freely

The term 'whistleblowing' has come to mean disclosing concerns outside an organisation, usually by informing the media or a regulator. This is a last resort. In contrast, 'Speaking Up' implies raising a concern internally early so that it can be remedied, ideally before it becomes a bigger problem.

How to Speak up:

Your concerns can initially be raised with your line manager. If this is not possible, or impractical, you can contact:

- The People Team on **01737 743514**
- Ethics Committee (Sarah Taylor, Stuart Hammond or Jay Johnston)
- Group Finance Director, Stuart Hammond

We partner with an external organisation called Protect who can provide confidential and impartial advice on Speaking Up and ethical matters

Call: **0207 404 6609** or

Email: whistle@protect-advice.org.uk

We would like all of our people to feel confident and supported to do the right thing. Speaking up when something doesn't feel right shows integrity and courage. It helps to prevent mistakes and shows that we care about each other and the business. Collaboration includes sharing concerns and having difficult conversations, honestly, openly, professionally and with good intentions. We protect against retaliation. If you report a concern, it will be handled appropriately and confidentially. No individual who raises a concern in good faith will suffer any consequences in terms of their employment, career or working relationships.

Examples of suspected activity that must always be reported include (but are not limited to) the following:

- Criminal activity.
- Miscarriages of justice.
- Falsification of financial or other records.
- Instances of fraud, bribery or corruption.
- Failure to comply with a legal, professional or regulatory obligation.
- Danger to health or safety.
- Damage to the environment.
- Conduct likely to damage our reputation.
- Conflicts of interest.
- Actions intended to conceal any of the above

Read more about Speaking Up [here](#).



No Retaliation

All of our people are expected not just to act according to the Code of Ethics but to report any behaviour that they believe is illegal, unethical or which does not comply to our values or policies.

Under no circumstances will we tolerate any retaliation against an individual who raises a concern in good faith about behaviour they believe to be in breach of the Code. Any such retaliation must be reported and will be dealt with through our disciplinary procedures.

If you are worried about any form of retaliation please talk to your line manager, their line manager or the People Team.

Quality

Maintaining accurate business records

Transparency is a core value of the company. We expect all of our people, subcontractors and partners to uphold the highest standards of ethical behaviour.

In this respect we maintain accurate and complete records, without exception. This ensures that we are able to demonstrate that we have delivered to our customers on our promises and that the financial information provides an accurate portrayal of our trading position. This also establishes full accountability for Safety Health and Environment protection, employment law and other key business functions.

It is never acceptable to falsify any records. If anyone is asked to falsify a record, or suspects that this may be happening, they must report it immediately in line with our [Whistleblowing Policy](#).



Commitment to Quality

We are committed to delivering high quality work that exceeds the needs and expectations of our customers. Being recognised as an organisation synonymous with quality and innovation is the best way to secure the future prosperity of the company and our people.

The principles behind our commitment to quality are as follows:

- We continuously seek better ways of working to create value for our customers by being innovative and improving our products and services.
- We work collaboratively with suppliers and partners to put the needs of the project and the customer first.
- We take ownership of our defects or errors to rectify them quickly, learn from the experience, and prevent recurrence.
- We have the courage and confidence to hold each other to account and report any sub-standard or non-compliant work.
- Quality improvement starts with each one of us: the attitude and commitment we bring to our work every day.
- We consider environmental and social factors and how they affect the quality we need to deliver to our customers



Integrity



Conflicts of Interest

We are committed to the highest standards of ethical behaviour and openness. Any potential conflicts between the interests of Osborne, any of our individual people, our suppliers and our customers must be fully disclosed, without exception.

Hospitality, gifts, entertainment, political or charitable contributions or close personal or family relationships are typical areas that can raise the potential for a conflict of interest. All circumstances that could reasonably raise suspicion of a conflict should be avoided if possible, or disclosed if they cannot be avoided.

All of our people must always exclude themselves from any decision making process in circumstances where they might be seen to have a personal interest.

No individual should act or make decisions that are influenced by the potential for personal gain, whether financial or in kind.

- Report any potential conflict of interest to your manager immediately.
- Be cautious when accepting or offering hospitality, gifts, entertainment or donations.
- Think how your actions would look to a 'reasonable person.'
- Exclude yourself from decisions where it could be seen that you have a personal interest.

What if?

I would like to employ an Osborne supplier to carry out repairs on my home. Is this allowed?

A general rule of thumb is that all circumstances that could reasonably raise suspicion of a conflict should be avoided if possible, or disclosed if they cannot be avoided. In this case, you should speak to your line manager about this issue before engaging in any discussions with the supplier.

If in any doubt, consult the decision making framework on [page 5](#).



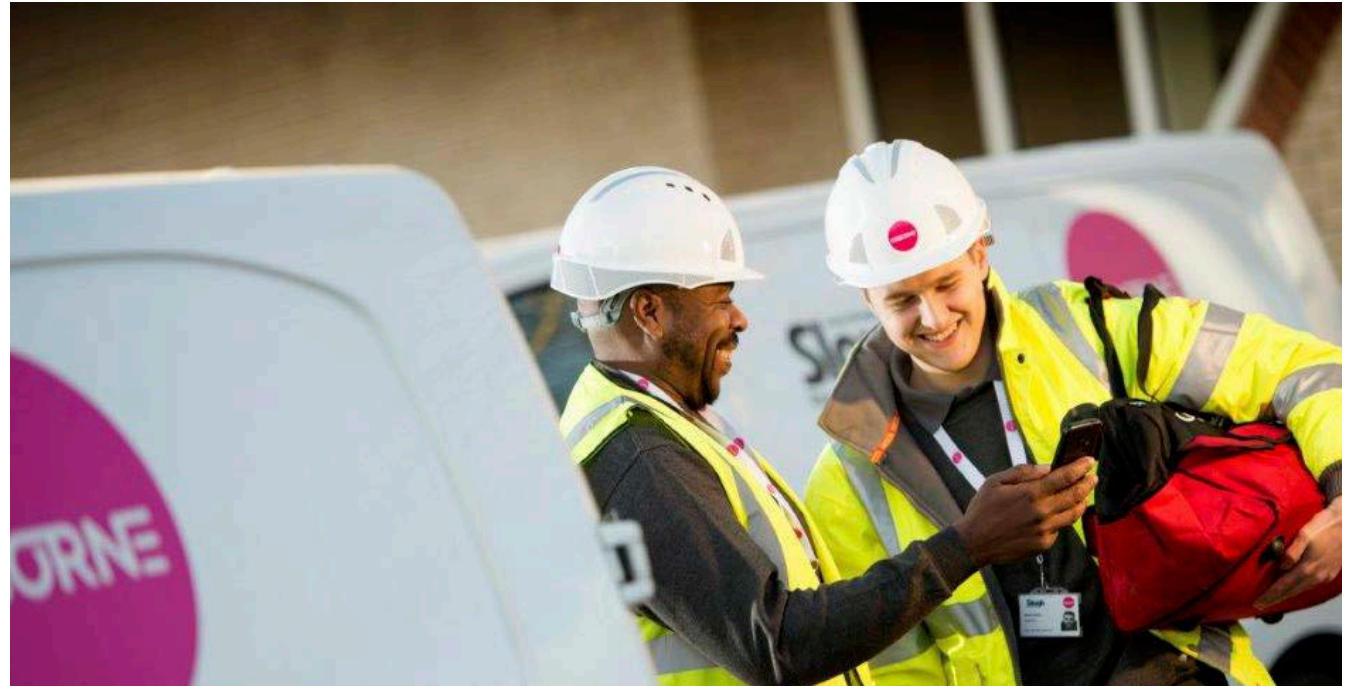
Fraud

We hold a zero tolerance policy towards any deliberate attempt to mislead in order to gain a financial or material advantage.

Fraudulent behaviour includes (but is not limited to):

- False claims such as inaccurate recording of costs for services or materials, whether by our people, our suppliers or partners.
- Concealing defects by, for example, falsifying test or inspection results.
- Any attempt to fabricate evidence or withhold material facts.
- Inappropriate, inaccurate or misleading expense claims.

All our people are expected to report any suspected fraudulent activity by colleagues and suppliers. Knowingly ignoring or failing to report suspected fraudulent activity, however minor, is contrary to this Code of Ethics and your Contract of Employment.



Relationships with External Providers

All of our people are representatives of Osborne. As such, we expect that everyone will uphold our values in their relationships with our supply chain partners, competitors and customers. These relationships will always be conducted in a way that is professional, ethical, open and honest. We will not work with organisations or individuals who do not share these values.

Any suspected fraudulent activity on the part of external providers must be reported. Issues raised will be handled in line with our [Whistleblowing Policy](#).

Gifts and Entertainment

Gifts and entertainment can be legitimate aspects of building positive relationships between businesses. These must never be offered or accepted where there is an explicit or implicit expectation of receiving something in return or more favourable treatment. Individuals must never request or solicit gifts or entertainment from suppliers or outside organisations in relation to their work with Osborne Group.

When considering whether to offer or accept gifts or entertainment ask yourself the following questions:

- Is it in the best interests of the company?
- Could it be suspected that something is expected in return?
- Is any aspect of it immoral, illegal or unethical?
- Is there a clear business-related purpose?
- How would this look to somebody else?

Many of our customers will have policies that govern the acceptance of gifts or entertainment. These policies must always be respected.

Promotional items such as corporate merchandise are considered as gifts. If they have a nominal value it is unlikely that they would result in a conflict of interest. Entertainment of moderate value is also unlikely to be considered as a potential inducement or conflict of interest.

Our people should exercise discretion. If you would not be happy for colleagues, customers or the general public to know about your actions, don't do it. Gifts of cash or cash equivalents must never be offered or accepted.

Events such as supplier-sponsored conferences should only be attended where there is a clear business purpose. Social events or activities organised around such conference should be avoided if they are unrelated to the purpose of the conference or could give the impression of improper behaviour.

Read more about Gifts, Entertainment & Fraud [here](#).



What if?

In my culture, it is typical to give and receive holiday gifts from clients. But the Code indicates there are circumstances where the gifts may be considered inappropriate. What should I do?"

When considering whether to offer or accept gifts or entertainment ask yourself the following questions: Is it in the best interests of the company? Could it be suspected that something is expected in return? Is any aspect of it immoral, illegal or unethical? Is there a clear business-related purpose? How would this look to somebody else? Many of our customers will have policies that govern the acceptance of gifts or entertainment. These policies must always be respected.

If in any doubt, consult the decision making framework on [page 5](#).

Anti-Corruption and Anti-Bribery

Corruption and bribery in any form are unacceptable. These practices have a corrosive effect on society and are bad for business. Any actions by our people or suppliers that might constitute, induce or encourage a misuse of power, or which could corrupt commercial activities (such as contract awards) will not be tolerated.

Offering or accepting of bribes or 'kickbacks', nepotism, cronyism, or undisclosed facilitation payments have no place in our company. Everyone has a duty not to engage in these activities and to report any instances of corruption or bribery they suspect to be taking place or solicited.

Remember, improper inducements may not always be financial. They could include large value gifts or offers to employ or provide internships to friends or family members.

Individuals must report any misuse of funds and resources.

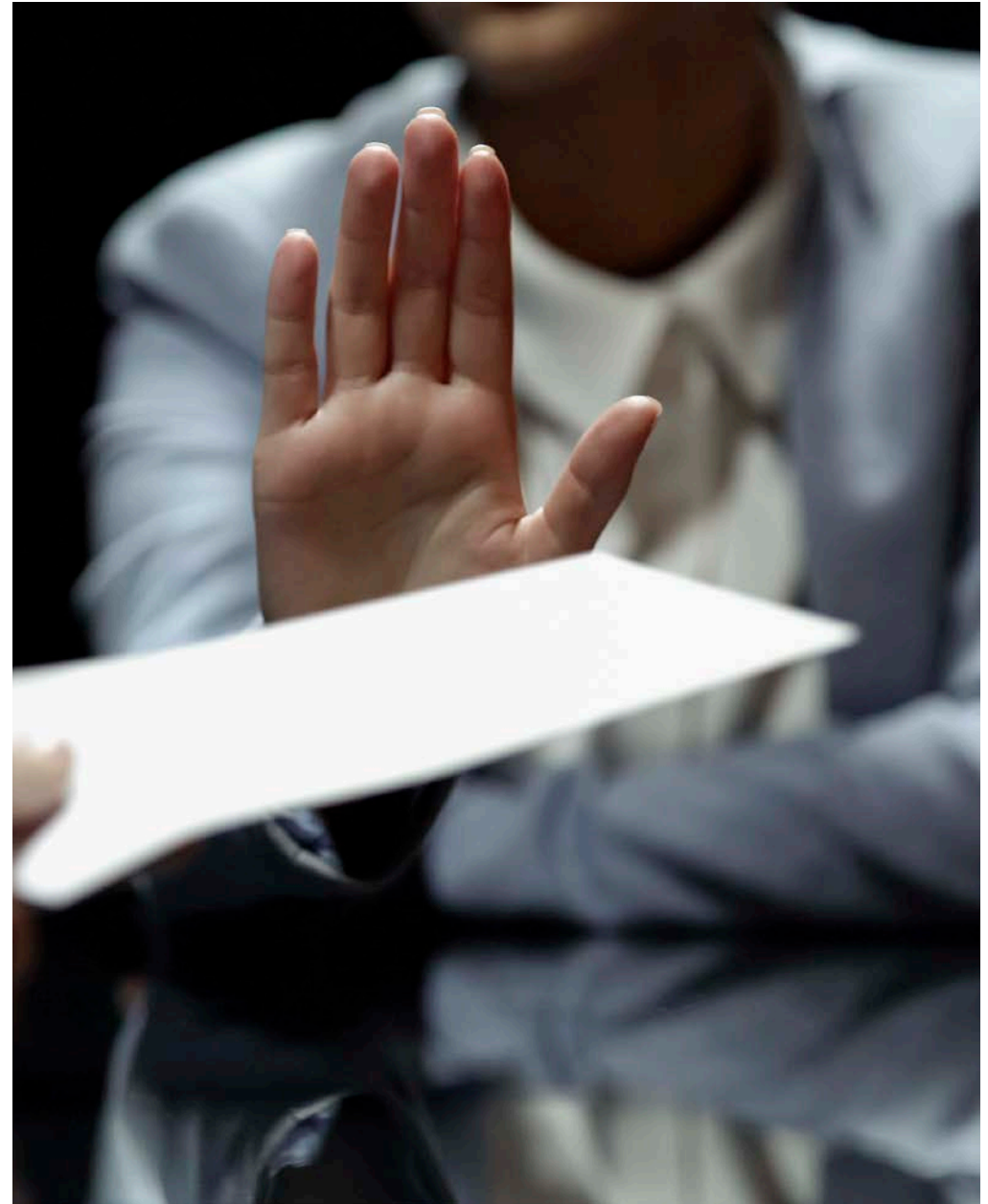
A bribe is not only payment or receipt of cash. A bribe can be anything of value and can take many other forms, including:

- Payments in-kind including any non-cash items of value such as travel, hospitality, entertainment, employment opportunities, and gifts;
- Employment of family members of government officials outside the normal hiring process; and
- Sponsorships/donations.

Read more about Bribery & Corruption [here](#).

"Integrity is a central part of how we do business and we are prepared to walk away from situations that compromise our values."

Stuart Hammond, Group Finance Director



Money Laundering

Money derived from criminal sources and activities is often routed through offshore accounts and shell companies so that the source becomes difficult to trace. The money then appears 'legitimate.'

We will only work for or with legitimate businesses with legitimate business interests. Our people are expected to be highly vigilant. Osborne is committed to reporting any suspicious financial activity to the appropriate authorities.

We will always conduct due diligence to confirm the legitimacy of prospective customers and business partners. We must be satisfied that the origins and destinations of their money are legal, transparent and as claimed.

Suspicious activity includes:

- Payments by or to third parties not involved with the contract.
- Payments from offshore or foreign accounts.
- Requests for cash payments.
- Requests for overpayments or payments split into batches.

If you suspect suspicious activity speak to your line manager or the Finance Department.



Sponsorship and Charitable Donations

Osborne aims to be a good corporate citizen. We engage positively with the communities in which we work and are fully committed to delivering social value through our projects.

We encourage everyone to engage with community activities and each Osborne person has a community day per year to devote to work in the community.

Read more about Community Days [here](#).

All charitable activities and donations must be given in line with our [Anti-Corruption](#) and [Anti-Bribery policies](#).

They must never be done with the expectation of receiving any kind of favourable treatment or reward in return.



Political Activities

Any form of political donation, activity or lobbying must be treated with the utmost caution. Some of the charitable organisations we work with may have a political dimension if, for example, their work relates to equality and diversity or the environment. Any support offered must comply with our Code of Ethics and values and must always be authorised by an appropriate officer of the company. Lobbyists are intermediaries who seek to influence policy on behalf of organisations or groups. From time to time it may be appropriate to engage with a lobbying organisation in relation to issues affecting our sector. We should always consider whether this activity may be more appropriately organized through a relevant industry body.

Any intermediaries must also comply with our ethical standards and values. It is important to remember that no one at any level of the company must make a political donation or become involved in political activities on behalf of Osborne. Anyone wishing to do so should seek permission from the Group Board..

Any donations or lobbying activity must comply with our [Anti-Corruption and Anti-Bribery policies](#).

Fair Competition

We believe in free, open and fair competition as the best way to promote innovation and value in our industry. We do not participate in any form of price fixing, bid rigging, or market sharing with customers, competitors or suppliers.

Antitrust and competition laws and regulations carry strict penalties. Any breaches of these regulations could severely damage the reputation and financial prospects of our business. Any activity that you suspect may be contravening these regulations must be reported to your manager or an officer of the company.

Individuals engaged in tendering activities must never discuss upcoming or live tenders with competitors. You should report any attempt by a competitor to involve you in such discussions (even informally). We must never engage in any activity or agreements with external organisations that could have the affect or appearance of restricting competition.

Where we enter into joint ventures, the arrangements will always be transparent and ethical. In no way should they be an attempt to circumvent competition laws and regulations. The letter and spirit of our Code of Ethics will apply to all joint ventures and partnerships.



Openness

Inclusion

We strive to create a welcoming environment for all. We are committed to the Fairness, Inclusion and Respect (FIR) agenda and to encouraging equality and diversity among our workforce and our subcontractors. We do not tolerate any form of discrimination (direct or indirect), victimisation, bullying or harassment.

Protected characteristics under the Equality Act 2010 are as follows:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

There is a separate policy for each of the above available from the Policy Hub.

Equality means ensuring that our people, customers and suppliers are treated fairly and equally. Sometimes we have to treat some people differently for them to experience equal treatment with access to the same opportunities as other people.

We value the diversity of our people, customers and suppliers. It strengthens the company and helps us meet customer needs and our business goals.

All our people are expected to act at all times in a non-discriminatory way in the spirit of the FIR agenda. It is also your responsibility to challenge and report any inappropriate or discriminatory behaviour you encounter or witness on the part of one of our people or subcontractor.

All reports of inappropriate behaviour will be treated confidentially and in line with our No Retaliation Policy.

Read more about Inclusion [here](#).

Read more about Bullying & Harassment [here](#).

"At Osborne, we value diversity of thought and experience. Sharing, listening, and collaborating are fundamental elements to our ability to progress and innovate."

Sarah Taylor, Group People Director

What if

During a training session, the trainer makes an offensive joke, visibly upsetting one of the attendees. What should I do?

The business does not condone any sort of bullying or harassment. You should encourage the person to follow the guidance in the Bullying & Harassment Policy, which is in the first instance and if appropriate to attempt to resolve the problem with the trainer colleague directly by making him aware of the effect of his behaviour on her.

If comfortable and as you heard the comment, you could offer to be with the attendee at this conversation to support them. If the attendee does not want to take this course of action, then you should let the attendee know of; 1. Their right to make a formal written complaint, this would trigger an investigation into the matter 2. their collective responsibility to ensure we uphold the company values and addressing poor behaviour. You should also reassure the attendee that they will not be subject to any victimisation or intimidation as a result of raising her complaint. Additionally, you have a responsibility to report this matter to his Line Manager and the People Team, this forms part of your role in upholding the company values and collectively addressing inappropriate behaviour.

Protection from harassment also applies where a person is generally abusive to other workers but, in relation to a particular worker, the form of the unwanted conduct is determined by that worker's protected characteristic."

If in any doubt, consult the decision making framework on [page 5](#).



Friends and Relatives; Co-Worker Relationships

It is important that all decisions are seen to be made in the best interests of Osborne and our customers. You must not take part in any management or decision making that would involve your relatives, spouse, partner or close friends. In particular you must not be involved in the selection process for employment if one of the candidates is a relative or close friend. You must not represent Osborne in any business dealings with a company associated with your spouse or partner. This affects relationships with our people, our customers, suppliers and business partners.

The fact that a relative, spouse, partner or close friend works for Osborne, a customer, competitor or business partner does not automatically create a conflict of interest. It can, however, create a sensitive situation. Be aware of any potential conflict of interest and ask yourself whether a reasonable person might suspect that decisions had been influenced by the relationship. If you think this is the case inform your manager and HR of your relationship. Take active responsibility for excluding yourself from any decisions that could be seen to have been influenced by personal relationships.

Workplace romances are a fact of life. Individuals who enter into a personal relationship should be sensitive to their work roles and the potential for an actual or apparent conflict of interest. You should be aware that we may insist on a change of job role to ensure there is no conflict of interest.

Caring

Safety Health and Environment (SHE)

To continuously improve our safety, health and environmental performance, everyone representing the Company must take individual ownership when they see things that could be improved.

We are committed to ensuring that everyone who works with and for us goes home safe every day. Our aim is to have zero accidents, zero health risks, and zero incidents that could harm the environment.

The principles behind these policies are as follows:

- Safety comes first. If something cannot be done safely, we don't do it.
- We do not cut corners or choose options that increase the risk of injury, ill health or environmental harm.
- We support our people to take better care of their safety and health through education, training and positive leadership by example.
- We are a learning organisation, committed to learning from all incidents and to sharing lessons and good practice as widely as possible through our Stop Think! programme.
- We have a collective responsibility to work in a safe way and to report any unsafe working practices.
- Being safe is good for business, no one wants to work for a company who is not safe.



We have a dedicated Safety Health and Environment (SHE) professional team to support customers, our people, subcontractors, suppliers or members of the public. We also operate a telephone-based SHE Advice and Reporting Hotline 0845 130 7966.

We introduced our Cultural change programme Stop Think! in 2012 and it continues to grow and develop throughout our company.

Our Safety Health and Environmental Policies provide detailed guidance on how to protect yourself, your colleagues and the environment and must be complied with at all times.

We all have a responsibility for SHE. We all have the authority and responsibility to challenge any unsafe or risky activities we encounter.

Read more about SHE [here](#).

Wellbeing

Wellbeing is a sense of contentment and physical security. It is also the absence of anxiety, depression or other forms of poor mental health. It is extremely important to us that our people are healthy, happy and maintain a well-balanced work life.

We encourage our people to be friendly, open and supportive of their colleagues and those that they come into contact with through work. If you see someone that you work with who seems to be struggling with ill health, workload or problems we would encourage you to approach them and see if there is anything that you can help with. Sometimes just knowing that others are interested and want to be supportive makes people feel more positive.

If appropriate you can direct them to our Employee Assistance Programme (EAP) – Supporting You. This is a free, confidential advice service that is open to all of our people and their family members. The EAP covers a wide range of problems including health problems, help with financial issues and legal advice. The telephone number is 0800 072 7072.

We recognise the impact that mental health has on wellbeing. We are committed to normalising the conversation about mental health in the workplace and have put in place trained 'Mental Health First Aiders'.

We aim to provide a supportive environment where all of our people feel able to discuss concerns about their own or colleagues' wellbeing and are confident that appropriate help and support will be provided.

We aim to enhance health and wellbeing through informed healthy lifestyle choices to prevent illness.

We are determined to continuously enhance health and wellbeing through informed healthy lifestyle choices to prevent illness. That's why we have created an interactive [health and wellbeing calendar](#). Each month provides information on specific health and wellbeing topics, including tool box talks, videos, useful websites and posters



What if?

I am having difficulty finding a good work/life balance, and my mental health is declining because of it?

If you feel that you are able, speak to your line manager or a Mental Health First Aider about what you are feeling. Alternatively, support is available by contacting the People Team and our EAP – 'Supporting You' 0800 072 7072 who can provide support and guidance.

One in four of us will experience a mental health problem and 9 in 10 say they have faced negative treatment from others as a result. By choosing to be open about mental health, we are all part of a movement that's changing the conversation around mental health and ensuring that no one is made to feel isolated or alone for having a mental health problem. We look forward to the day when mental health is perceived to be the same as physical health.

Another way of finding a healthier work life balance is by choosing to make the most of your Community Day.

Giving back to a charity that you relate to is a great way of utilising your Community Day. It provides you with an opportunity to support your preferred organisation and allows you to take a step back from the pressures of work.



Once you've taken advantage of your Community Day, make sure to share your experience with us by contacting communications@osborne.co.uk.

To find out how to book your Community Day [click here](#).

I notice a colleague acting differently, being irritable, aggressive, impatient and wound up. They have been finding it hard to make decisions, and not being able to focus properly. What should I do?

Firstly, start a conversation; this is the first stage in providing support. Asking 'how are you' can go a long way.

Simply giving someone space to talk, and listening to how they're feeling, can be really helpful in itself. If they're finding it difficult, let them know that you're there when they are ready. If a colleague opens up about their feelings to you, you could suggest that they speak to their line manager about their concerns or one of the Mental Health First Aiders. In addition, you can signpost them to Atlas Health and Wellbeing area, our People Team and our EAP – 'Supporting You' 0800 072 7072 who can provide support and guidance."

If in any doubt, consult the decision making framework on [page 5](#).

Our commitment to Fair Working Conditions

Modern slavery is a largely concealed crime and involves one person denying another person their freedom. This can take many forms, including human trafficking, servitude and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. There are an estimated 136,000 victims of forced labour in the UK, and an estimated 40.3 million victims worldwide. Clearly, the challenge of eradicating modern slavery remains, and Osborne is committed to ensuring that effective systems and controls are in place to ensure modern slavery is not taking place anywhere within our business.

All of our people, customers, subcontractors and other partners will be treated fairly and with respect at all times. No form of harassment (sexual, physical or verbal), bullying, discrimination, or victimisation will be excused or tolerated under any circumstances. If you witness such behaviour from an Osborne colleague or subcontractor it is your duty to challenge and report it.

Modern Slavery

We have a zero-tolerance approach to Modern Slavery and human trafficking.

We are committed to our supply chain being free from any form of child, or forced labour. We will not do business with any organisation that appears to practice any of the following:

- Forced or compulsory labour.
- Withholding of passports, visas or other personal documentation.
- Debt bondage.
- Payment or benefits that do not comply with employment law.
- Unsafe or unhealthy working practices.

It is each of our responsibilities to ensure that everyone involved in our business is treated with the respect and dignity that they deserve.

We ask all staff to be vigilant. Suspicions of Modern Slavery existing or being connected to our business or supply chain must be reported immediately and will be handled in accordance with our

[Whistleblowing Policy](#).

Read more about Modern Slavery [here](#).



Data Protection Act 2018 (Protection of Personal Data)

It may be necessary to hold personal data about our people or partners in connection with their employment or work with us. We comply with all relevant legislation and seek to employ best practice with the protection of personal data.

Personal data is anything that can be used to identify a specific individual and could include name, address, phone number, date of birth, personal email address, family information or photographs.

Our commitment:

- We will not hold any personal data beyond what is strictly necessary.
- We will use appropriate security measures to ensure personal data is protected and not compromised.
- We will only share personal data with any external organisations if required to do so by law and with legal & contractual safeguards for personal data.
- Select Osborne people will only have access to personal data where there is a clear and legitimate reason.
- We will not retain personal data for any longer than needed for the specific purpose for which it was provided.



All individuals who need to access personal data must respect the confidentiality of that data. They must protect the data from loss, theft or unauthorised access, and not access or use it beyond the limits of their job remit.

Everyone must respect the privacy of each individual and not seek to access personal data without good reason. If you see personal information about somebody that you believe you should not have seen, or you become aware of a data breach, you must report it to the Data Protection Officer at dataprotection@osborne.co.uk

Read more about Data Protection [here](#).

Data Protection Act 2018

The Data Protection act 2018 is there primarily to protect people. Therefore, we take our obligations to protect data and the privacy of our people, customers and suppliers very seriously.

All of our people are expected to be sensitive to the security of personal data and ensure that along with other colleagues; personal data is not downloaded onto unsecured C: Drives, memory sticks or personal computers.

Confidentiality

Like all businesses we handle confidential information. This information can be our own, our customers' and our stakeholders'. Protecting confidential information is essential for our commercial success. Trust and confidentiality are essential for maintaining our valued relationships with customers and partners.

Safeguarding confidential information is something we take very seriously.

Producing an exhaustive list of confidential information is difficult and all of our people are expected to exercise appropriate judgement and discretion. Confidential information could include trade secrets, methods or technologies that are unique to Osborne, project tenders and pricing, business plans, customer information, personal data, financial information, or information related to investigations and complaints.

All of our people are expected to take appropriate steps to protect confidential information. Never use, store or share confidential information unless you are authorised to do so.

Confidential information must be protected from loss or theft, including mobile computing devices such as smartphones, laptops and tablets.

If you receive confidential information by mistake, contact the sender and notify your manager. Do not discuss or share the information with anyone else.



- Confidentiality is your personal responsibility.
- Never use, store or share confidential information without authorisation.
- Report confidential information you receive by mistake immediately and never share it.
- You must protect confidential information from loss or theft at all times.

What if?

I am unsure whether I should include certain information relating to a SAR request in an email?

Privacy and confidentiality must be our default setting. We should only divulge information if there is a sound business reason to do so. This means that we should not volunteer information if we do not need to. Confidential information about a companies activities, that must never be divulged, includes:

- Pricing information
- Customer databases or information
- Supplier data or information
- Personal Data or Information

If you are in any doubt on whether or not to divulge information, Stop, Think, and seek guidance.

If in any doubt, consult the decision making framework on [page 5](#).



External Communications (including social media activity)

The way we communicate with the outside world directly affects our reputation and the way that Osborne and our brands are perceived. It is essential that all external communications, whether printed, digital, promotional, and through social media channels, reflect our brand identities and values.

Our Caring for our Visual Identity document specifies the approved use of fonts, colours and logos. These guidelines must always be followed so that we project a consistent and professional image throughout all communications and materials.

Queries, complaints or feedback from external individuals or organisations will always be handled politely, professionally and in keeping with our values and principles of confidentiality.

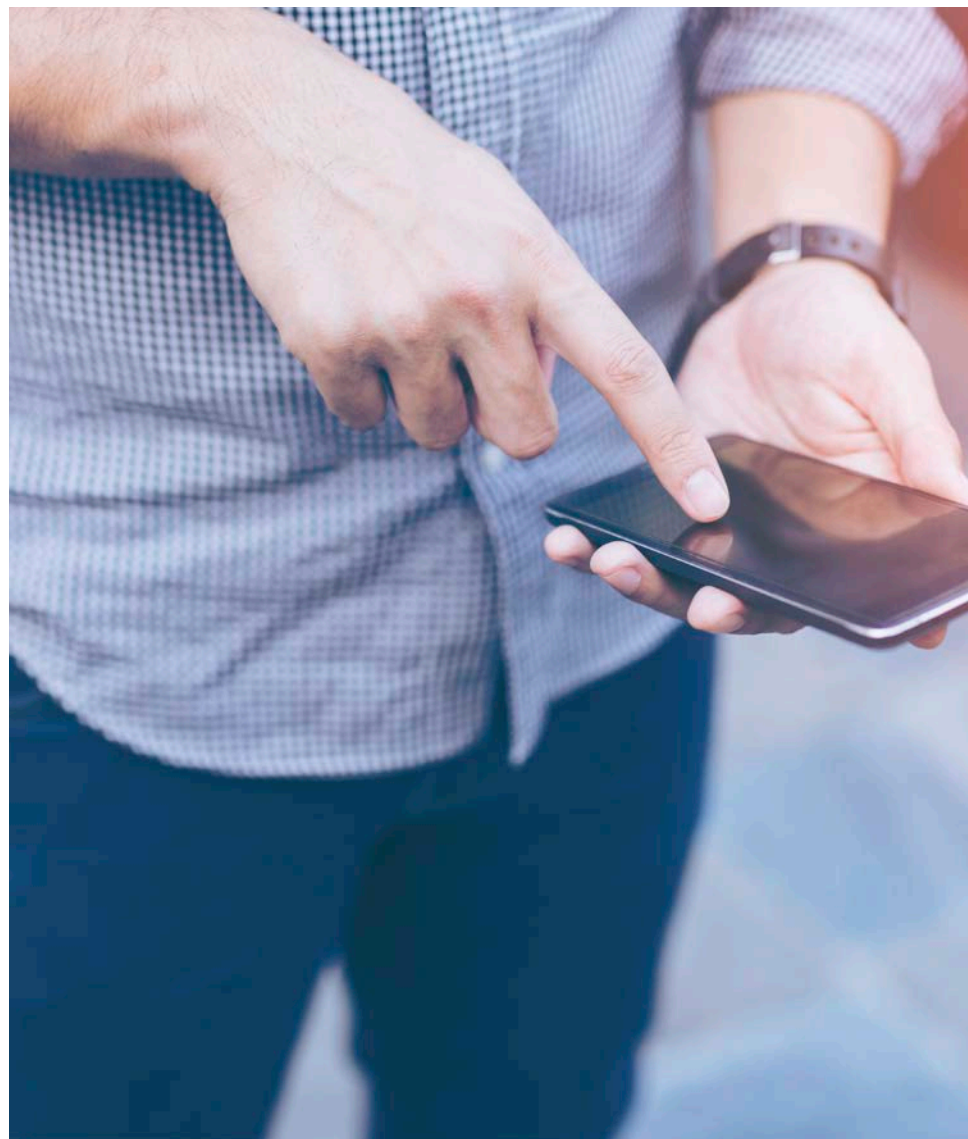
Only people with specific authorisation may speak or communicate by email etc to the media on behalf of Osborne. Media requests for information should always be directed to the Group Marketing and Communications Director and copied to the media relations representative for your operating company or business unit.

Read more about Media Relations [here](#).

Be particularly careful with social media posts to ensure that your personal views do not become confused with those of Osborne. Any personal social media activity that could harm the reputation of Osborne could result in disciplinary action.

Read more about Social Media [here](#).

External communication also includes the way we conduct ourselves when we meet customers, suppliers, the public and other stakeholders. All our people are expected to conduct themselves in a way that corresponds to Our Values and reflects positively on Osborne.



Progressive

Sustainability

Sustainability is a collaborative commitment to improve people's lives and the environment around us. Responsibility falls on each of us to ensure that sustainability targets are actively managed throughout our projects. This is why we also work closely with our supply chain and partners, to consider sustainable risks and opportunities at every stage of each project, from tendering to delivery, whether or not there is a formal or contractual requirement.

At Osborne, we seek to minimise the environmental impact of our activities and to deliver environmental improvements along our project. This is because a healthy environment enables healthier and happy people. So, we actively promote ways to improve the environmental performance of our operations and of the buildings and structures we create.

Where practicable, sustainable methods and materials will always be given preference.

We are committed to providing sustainable, intelligently designed spaces, that improve people's lives. We pursue a self-development led business, which delivers better outcomes across every stage of our lifecycle.



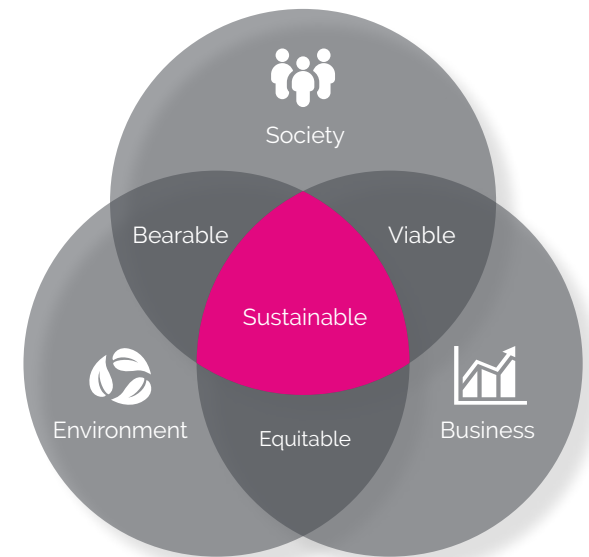
Growing and supporting our people to make a positive, lasting impact on the communities we serve.



To protect, manage and enhance our natural environment.



Delivering outstanding value to our customers and our shareholders.



If we get the balance right between all 3, we have a sustainable business; one which has an integrated approach to balancing social, environmental and economic impacts.

Read more about Sustainability [here](#).

Sustainability

The United Nations Sustainable Development Goals, set up in 2015, were designed by the UN General Assembly as a "blueprint to achieve a better and more sustainable future for all". Intended to be achieved globally by the year 2030, they are central to our efforts towards sustainable development. These goals have driven us to use modern construction methods which have put us at the forefront of the carbon net journey.

"The essence of sustainable development is doing the right thing. It is about providing solutions and services which improve people's lives. The SDGs show that sustainability is not just about the environment."

Jay Johnston, Head of SHE



What if?

I notice an electrician working on a ladder that is too short, causing him to stand close to the top of the ladder to do his work. He can't maintain 3 points of contact, increasing his accident risk. We are also under pressure to finish the job on time. What should I do?

At Osborne we never walk by and leave an unsafe situation. If you see something unsafe mention it immediately to the person at risk and wait until it is resolved. If this does not work escalate it to the relevant manager. If the relevant manager is unavailable, contact the SHE advice and reporting number on **0845 130 7966**. Nothing is so urgent it cannot be done safely. Remember, there is no compromise on safety.

I notice hydraulic fluid is leaking from plant equipment, but it's the end of the working day and most people have already gone home. What should I do?

Consult the Pollution Incident Control Plan (PCIP) [Osborne Poster - Pollution Incident Control Plan_1.10.docx](#). Call the SHE Incident Hotline immediately to report the incident and gain advice.

The SHE team will assess the situation and decide if a specialist contractor is required. In the rare instance the SHE Team cannot be contacted and the pollution is an immediate risk to the natural environment, human health or water system, please contact the clean up contractor within the PCIP.

What if? A client has enquired Osborne's social value process. What should I do?

Communicate to the client that Osborne is committed to supporting social value across all our contracts. Social value is a conscious decision to support and contribute to the communities in which we work. This can be done by tackling economic inequality, fighting climate change, promoting equal opportunities by creating new jobs and skills and concentrating on our wellbeing.

Our framework is aligned to central government's commitment to build back better. To measure our outcomes, we use a product called Thrive Impact which captures, calculates and evidences our activities/initiatives.

If in any doubt, consult the decision making framework on [page 5](#).

Learning, Developing and Thriving

We are committed to providing learning and development opportunities to all of our people, so they can take ownership of the work they do, feel empowered to deliver their objectives and develop their skills and talents.

Being our Best

We encourage all our people to actively be part of their personal development, and together with their line manager, seek opportunities to enable them to progress and be at their best.

To keep us motivated and on track, it's important to know how well we are doing. Your manager has a responsibility to support and develop you, giving you feedback in the

Moment. We all have a responsibility to seek out feedback from our line manager and others, and to act on it to the best of our ability.

Developing our Performance - On-going Conversations

When we are learning and thriving, we connect with each other in an authentic way and communicate frequently. Whether you're responsible for a team or individual contributing, you should be having check-in conversations that are ongoing - daily, weekly, and quarterly objective setting conversations.

This enables all our people to take accountability for their own performance and development objectives and how they approach achieving them.

Success and Continuous Improvement

We should feel proud of all the things that we achieve. Equally we should also be open to exploring our key challenges, uncovering what we find difficult and finding support and ways to overcome them.

Personal Development

This involves exploring the skills and behaviours we need to be successful and do our jobs well.

Then, understanding the actions and steps we need to take to keep doing good work and thrive.

Career Aspirations

Talking about career goals is valuable in keeping us motivated and engaged. Whether your goal is to progress into a broader role or excel in your current role, we each need to identify what that looks like and the path to get there.

Tools and Resources to Support you

Our aim is to provide easily accessible guidance to build skills, capability, and career plans. To support this, we have a number of useful resources and tools:

- [Your Learning](#) – our Learning Management and Performance Development System – you'll find many resources and learning opportunities to help your planning

YOUR LEARNING

- [Your Personal Value Proposition](#) – a learning framework that will support you to personalise development, improve performance, find out how to make learning and development effective, what development is available to you or your team and help with career plans.
- [Learn App](#) – Accessing learning on the go, anytime





Each of us have a responsibility to speak up about issues that we encounter.
This enables them to be solved promptly and properly.

We listen and take action. Speaking up is an essential first step in doing this.
For any concern, allegation or complaint, we investigate and address the situation
appropriately and confidentially. If you would like to learn more about our
investigation process, and your options for anonymous reporting, contact the People
Team at **01737 743 500** or peopleteam@osborne.co.uk, the Ethics Committee
(Sarah Taylor, Jay Johnston or Stuart Hammond) or our impartial advice line on
0207 404 6609 or whistle@protect-advice.org.uk.

Remember that Osborne is committed to caring for and protecting our people
against retaliation.



QUALITY



INTEGRITY



OPENNESS



CARING



PROGRESSIVE